

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**IN RE: SEARS HOLDINGS CORPORATION, et al.  
DEBTOR**

**CASE NO.: 18-23538 (RDD)**

**CHAPTER 11**

**RESPONSE TO DEBTOR'S TWENTY-SECOND OMNIBUS OBJECTION  
TO PROOFS OF CLAIM (PROPERTY TAX CLAIMS)**

NOW INTO COURT, though undersigned counsel, comes Tony Mancuso in his official capacity as Sheriff and Tax Collector for Calcasieu Parish, (hereinafter referred to as "Sheriff "), who, with respect, represents:

1.

Calcasieu Parish Sheriff's Office (hereinafter referred to as "CPSO") filed a proof of claim on 11/21/2018 in the amount of \$158,167.28 for 2018 property taxes owed by Sears Holdings Corporation. (Attached as Exhibit A, in globo)

2.

There have been three payments on these property taxes. Two payments equaling \$50,993.39 paid by Sears Holdings Corporation and one payment in the amount of \$74,260.48 paid by Prien Lake Mall (Simon Property Group). These payments were made after the claim filed by CPSO. As a result, the balance owed for taxes is \$32,913.41. (Attached as Exhibit B, in globo)

3.

When we were made aware of the discrepancy between our original claim and the balance owed, CPSO filed an amended proof of claim to reflect the new balance of \$32,913.41. (Attached as Exhibit C, in globo).

WHEREFORE, after considering the documents and representations herein, CPSO requests that the Objection to the claim filed by CPSO be denied and that the amended claim previously submitted be accepted, deemed proper and placed in line for payment through the office of the Trustee.

Respectfully submitted:

BY: 

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of October, 2020, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Robert C. McCorquodale  
ROBERT C. MCCORQUODALE